

The Risk Management Plan (RMP) Acceptance Process

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Typically the HMD will request a Risk Management Plan in writing. A facility must complete this during the following time frames:

- 12 months to 3 years for an existing facility
- Before the regulated substance exceeds the threshold quantity on site. See the regulations for threshold quantities. New sites can often be pressed for time.
- Try to plan ahead!

Standard RMP request letter

- Asks for an RMP Work Plan-Registration Data within 30 days.
- Specifies when the RMP submittal is due.

Example of a request letter



Now prepare the RMP

- Can be written entirely by the stationary source if the required resources and expertise is present.
- Most common to use outside expertise such as consultants. Balance the cost/benefits.
- Occasionally corporate offices will have staff

Once Written, Submit the RMP Public Documents to your Administering Agency



A Portion of all the RMP Binders on File. Many of these are Duplicates



AA Responsibility and SS Responsibility: Request for Initial Public Notification

- Should be done within 15 days of an RMP Public Document submittal.
- The public Notification must run in a local newspaper of general circulation. Union Tribune or North County Times
- Must run for at least one day

RMP Request for Public Notification Example



Standard wording in the newspaper notification

COUNTY OF SAN DIEGO DEPARTMENT OF ENVIRONMENTAL HEALTH NOTICE OF SUBMISSION OF A RISK MANAGEMENT PLAN (RMP)

NOTICE IS HEREBY GIVEN that in accordance with Section 2745.2 of Division 2, Chapter 4.5, in Title 19 of the California Code of Regulations, the County of San Diego, Department of Environmental Health, Hazardous Materials Division (HMD), has received an updated certified Risk Management Plan (RMP) from the following site:
Circle Foods, LLC
At:
8411 Siempre Viva Road
San Diego, CA 92154
HMD has initiated the process for government and public review. Interested parties may be added to a notification mailing list by submitting a written request to the Risk Management Plan Coordinator, County of San Diego, Hazardous Materials Division, P.O. Box 129201, San Diego, CA 92112-0201.

RMP review process

- All documents are reviewed for accuracy and correctness
- Should be reviewed within three years of submittal.
- Hourly billing rate from SD County for review.
- The better the document, the faster and cheaper the review period
- All documents from San Diego County reviewed by the Hazardous Materials Division. No Participating Agencies.

RMP deficiency notice

- Explains missing information or lack of detail
- Specific to each section of the RMP
- Deficiencies must be addressed in 60 days with a one time 30 day extension possible

Example deficiency letter

Page two deficiency letter

Once the additional information is provided from the facility/consultant:

- Add to submitted public document
- Request any additional information. Usually done more informally if needed at all
- Determine the document to be complete and accurate. Prepare the completion letter

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Completion letter

- Your RMP has been accepted as complete and accurate
- Request for one day public notification. 45 day public review starts when this is published in a newspaper of general circulation.
- This is the 45 day formal review period. All public comments will need to be addressed

Completion letter example



End of Public Review Notification

- 45 days after newspaper notification
- Facility must address all public comments
- Typically few comments received
- The RMP is still available to the public for review

The process starts again for updates

- Five year updates
- 2x factor change in offsite consequence
- Once a threshold quantity is exceeded
- New regulated substance handled on site
- Within six months of a change requiring a new PHA
- Within six months of a change that results in a program level change

References

- California Health and Safety Code Sections 25531-25543.3
- California Code of Regulations, Title 19, Division 2, Chapter 4.5

Any Questions?

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